

FEDERAL ELECTION COMMISSION
999 E Street, N.W.
Washington, D.C. 20463

FIRST GENERAL COUNSEL'S REPORT

MUR 5020

DATE COMPLAINT FILED: 04/04/00

DATE OF NOTIFICATION: 04/20/00

DATE ACTIVATED: 9/25/00

SOL: 2/01/05

STAFF MEMBERS: Roy Q. Luckett

COMPLAINANT: Audrey L. Michael

RESPONDENTS: Gormley for Senate Primary Election Fund and
Alan C. Staller, as treasurer
Trump Hotels and Casino Resorts Inc
Donald J Trump
Mark Brown
Lawrence Mullin
Fred Buro
Harrah's Entertainment Inc
Atlantic City Showboat Inc.
Marina Associates
Howard Jonas
Herbert Wolfe
Mirage Casino Resorts Inc.
Richard "Skip" Bronson
Mark Juliano

RELEVANT STATUTES: 2 U.S C § 441a(a)(8)
2 U.S.C. § 441a(f)
2 U.S.C. § 441b(a)
2 U.S.C. § 441b(b)(2)
2 U.S.C. § 441b(b)(4)(A)(i)
2 U.S.C § 441b(b)(7)
11 C.F.R. § 100.7(b)(6)
11 C.F.R. § 100 7(b) (7)
11 C F R. § 104 9(a)
11 C.F.R. § 114.1(a)(2)(i)
11 C.F.R. § 114 1(b)(1)
11 C F.R. § 114.1(b)(2)

1 11 C.F.R. § 114.2(a)(2)
2 11 C.F.R. § 114.2(f)
3 11 C.F.R. § 114.2(f)(i)
4 11 C.F.R. § 114.2(f)(2)(ii)
5 11 C.F.R. § 114.2(f)(2)(iv)
6 11 C.F.R. § 114.2(f)(4)(ii)
7 11 C.F.R. § 114.3
8 11 C.F.R. § 114.9(a)
9 11 C.F.R. § 114.9(d)
10 11 C.F.R. § 114.9(e)(i)

11
12 INTERNAL REPORTS CHECKED: Dun & Bradstreet Dunsprint Service
13 Commission Indices
14

15 FEDERAL AGENCIES CHECKED: None
16

17 **I. GENERATION OF MATTER**

18 Audrey L. Michael¹ ("Complainant") filed a complaint on May 18, 2000 alleging that
19 certain persons violated sections of the Federal Election Campaign Act of 1971, as amended, (the
20 "Act") and the Commission's regulations. Specifically, she alleges respondents made and
21 received prohibited campaign contributions under 2 U.S.C. § 441b, and failed to report such
22 contributions.

23 **II. FACTUAL AND LEGAL ANALYSIS**

24 **A. THE COMPLAINT**

25 The complaint alleges that The Gormley for Senate Primary Election Fund ("Gormley
26 Committee"),² Trump Hotels and Casino Resorts, Inc. ("Trump Corporation") and four of its

¹ Ms. Michael serves as a member of the Atlantic City Democratic Party Committee

² William L. Gormley ran unsuccessfully against Representative Bob Franks for the Republican nomination for United States Senate in 2000. Since 1982, Mr. Gormley has represented legislative District 2 (Atlantic City) as a New Jersey State Senator. Currently, he serves as the Chairman of the State Senate Judiciary Committee.

1 executives, Donald J. Trump, Mark Brown, Lawrence Mullin and Fred Buro, Harrah's
2 Entertainment, Inc. ("Harrah's") and two of its executives, Howard Jonas and Herbert Wolfe, and
3 Mirage Casinos Resorts, Inc. ("Mirage") and two of its executives, Richard "Skip" Bronson and
4 Mark Juliano, have violated the Act and the Commission's regulations by improperly soliciting
5 contributions from employees of their respective corporations. The complaint further alleges that
6 "in all cases, employees of these corporations were compelled by senior executives to give to the
7 Gormley Committee in violation of the Federal Election Law prohibiting 'bundling.' "

8 Complainant interprets 2 U.S.C. § 441a(a)(8) and 11 C.F.R. § 110.6(b)(2) as stating that no
9 individual may receive a contribution on behalf of a candidate for Federal office while acting as a
10 representative of a corporation.

11 Regarding the bundling allegation, complainant asserts that each corporate entity, through
12 certain executives, collected contribution checks from employees and presented the checks to
13 Mr. Gormley. Concerning Trump Hotels and Casino Resorts, Inc., complainant avers that, on
14 March 27, 2000, the Trump Corporation held a fund-raiser to benefit William Gormley, a
15 candidate for the U.S. Senate. Concerning this event, the complaint adds "Mr. Mark Brown,
16 Mr. Lawrence Mullin, and Mr. Fred Burro solicited and received contributions from 32 Trump
17 Corporation employees for a total of \$28,800." The complaint also alleges "Mr. Brown collected
18 these checks. The checks then were turned over to Donald Trump who presented them to Mr.
19 Gormley."

20 Likewise, the complaint asserts that Howard Jonas and Herbert Wolfe solicited and
21 received \$31,000 in contributions from employees of Harrah's casino "The Showboat" and sent
22 the contributions to the Gormley Committee.

1 Finally, it is alleged that "Mr "Skip" Bronson and Mr. Mark Juliano improperly solicited
2 \$17,000 in contributions from Mirage casino employees and other vendors with contracts with
3 Mirage Casinos." Complainant avers that Juliano collected these checks and sent them to
4 Gormley.

5 **B. RESPONSES TO THE COMPLAINT AND OTHER PERTINENT**
6 **INFORMATION**

7
8 **1. Response of the Gormley for Senate Primary Election Fund**

9 On June 19, 2000, Alan Staller, Treasurer of the Gormley Committee, responded to the
10 complaint. Staller disputes the complainant's interpretation of 2 U.S.C. § 441a(a)(8) and
11 11 C.F.R. § 110.6(b)(2) that "no individual may receive a contribution on behalf of a candidate
12 while acting as a representative of a corporation." Attachment 1. Staller asserts that neither of
13 these provisions make such a claim. According to Staller, the statute places the burden of any
14 related reporting on the "conduit" or "intermediary," not the committee.

15 Staller also denies that the committee was ever aware of any "bundling" of contributions,
16 or corporations facilitating the making of contributions by compelling employees to contribute to
17 the Gormley Committee To his knowledge, "such monies were properly raised, among other
18 monies, for a candidate who has been supportive of the casino gaming industry in New Jersey."

19 **2. Response of Trump Hotels & Casino Resorts, Inc. Donald J. Trump,**
20 **Mark Brown, Fred A. Buro, and Lawrence Mullin**

21
22 On June 30, 2000, the Trump Corporation, Donald J. Trump, Mark Brown,
23

1 Fred A. Buro, and Lawrence Mullin³ collectively submitted a response addressing allegations
2 made against them in the complaint. Attachment 2.

3 The response addresses four facets of the complaint. First, the response avers that it was
4 Donald J. Trump who personally sponsored, paid for, and hosted in his residence the
5 March 27, 2000 reception for William L. Gormley. Specifically, the response asserts that
6 Donald Trump sponsored and hosted the reception in his individual capacity, not as Chairman of
7 the Trump Corporation. In addition, the response states that Trump was not reimbursed for the
8 costs of the invitations, food and beverages.

9 Second, the response argues that no executive of the Trump Corporation or its
10 subsidiaries collected or received a contribution to the Gormley Committee from any other
11 employee of the Trump Corporation or its subsidiaries. According to the respondent, contrary to
12 Ms. Michael's allegation that "Mr. Mark Brown, Mr. Lawrence Mullin and Mr. Burro (sic)
13 contacted various employees of the Trump Corporation and solicited and received contributions
14 from 33 employees," no employee of the Trump Corporation or its subsidiaries gave Brown,
15 Buro, Mullin, or Trump money for their respective contribution to the Gormley Committee. The
16 response explains that Gormley campaign aides staffed a table in the foyer of Donald Trump's
17 residence during the March 27, 2000 event, to whom reception attendees delivered their
18 individual checks to the Gormley campaign aides.

19 Third, the response argues that Trump did not present checks from employees of the
20 Trump Corporation or its subsidiaries to William L. Gormley. The response denies the allegation

³ Donald J. Trump is the Chairman of Trump Hotels & Casino Resorts, Inc. In March, 2000, Fred Buro was President of the Trump Plaza Hotel and Casino, Mark Brown was President of the Taj Mahal Casino Resort, and Lawrence Mullin was President of the Trump Marina Hotel Casino, all of which are subsidiaries of Trump Hotels and Casino Resorts, Inc.

1 that Brown collected contribution checks from employees of Trump Hotels & Casino Resorts,
2 Inc. and turned them over to Mr. Trump, who in turn presented them to Mr. Gormley. The
3 response asserts that “[n]either Mr. Brown, nor any other individual, gave Trump his or her, or
4 any other person’s contribution check to Gormley for Senate.”

5 Finally, the response avers that the Trump Corporation did not compel, pressure, or even
6 recommend to any subordinate that he or she should attend the reception, that he or she should
7 contribute to the Gormley Committee, or that he or she should contribute a specific amount to the
8 Gormley Committee. Id. at 4. Respondents contend that Trump states in his affidavit that he
9 informed Brown, Buro, and Mullin that employees of the Trump Corporation and its subsidiaries
10 were welcome to attend the Gormley reception whether or not they contributed to the Gormley
11 Committee. In addition, the response asserts that Brown, Buro, and Mullin each told members of
12 their respective “executive committees” that a contribution was not a requirement or a condition
13 to attending the reception.

14 The affidavits of Trump, Buro, Brown, and Lawrence Mullin confirm the statements in
15 the respondents’ June 30, 2000 response with some pertinent additional information. Trump’s
16 affidavit adds that approximately 100 persons attended the March 27, 2000 reception.

17 Attachment 3 at 3. The affidavits of Brown, Buro, and Mullin also add that after receiving the
18 invitation via mail and upon inquiry, Trump informed them that the invitation to the Gormley
19 reception was open to all executive personnel within their respective Trump divisions.

20 Attachments 4 at 1, 5 at 1, and 6 at 1. The affidavits of Trump corporate executives Brown,
21 Mullin, and Buro are identical with one exception. In line 7 of the affidavit, where Brown and
22 Mullin state that they “traveled to New York City to attend a business meeting of casino

1 executives which [was] regularly held every Monday," Buro crossed out the portion of the
2 statement that refers to weekly Monday casino executive meetings in New York City.

3 **3. Response of Harrah's Entertainment, Inc., and Herbert Wolfe⁴**

4 On July 20, 2000, Harrah's and Herbert Wolfe responded to the complaint.

5 Attachment 7. Respondents state that through subsidiaries, Harrah's owns two casinos in
6 Atlantic City, New Jersey: (1) Atlantic City Showboat, Inc., which operates a casino under New
7 Jersey license; and (2) Marina Associates, a partnership of two subsidiaries of Harrah's, which
8 operates and holds the license for the Harrah's Atlantic City casino. The response asserts that in
9 March 2000, after personal requests for support from the Gormley Committee, Wolfe, who
10 manages the Showboat property, and David Jonas, who is general manager of the casino licensed
11 to Marina Associates, "each told certain business colleagues that they planned to contribute to the
12 Gormley Committee, and invited various colleagues to do the same." The response adds that
13 these executives "acted in their individual capacities, and not on behalf of, or at the behest of, the
14 businesses they manage." The response also states that "a number of personal contribution
15 checks were delivered to the offices of Wolfe and Jonas, respectively, and Gormley Committee
16 representatives picked up each group of checks."

⁴ The complaint names "Howard" Jonas as a respondent. It appears, however, that the complaint may have been referring to David Jonas, general manager of Marina Associates, a Harrah's subsidiary. Attempts to obtain clarification from Ms. Michael on this discrepancy have been unsuccessful. While David Jonas does not officially respond to the complaint, he is represented by the same counsel that represents Harrah's and Herbert Wolfe. Furthermore, counsel for David Jonas submitted his conduit report, which was not previously filed before the Commission, as an attachment to the Harrah's Entertainment Inc. and Herbert Wolfe responses. In addition, the responses of Harrah's and Wolfe discuss the activities of David Jonas regarding this matter. Based on these considerations, this Office internally generates David Jonas as a respondent in this matter.

Regarding the reporting of these checks, the response acknowledges that Wolfe and Jonas each should have filed a conduit report, and provided such reports as attachments. Attachments 8 and 9.

4. Response of Mirage Casino Resorts, Inc., Messrs. Bronson and Juliano

On July 6, 2000, Respondents Richard "Skip" Bronson, Mark Juliano, and Mirage collectively submitted a response addressing the allegations outlined in the complaint. Respondents admit that Bronson and Juliano are executives of an entity affiliated with Mirage. Attachment 10. Respondents also assert that Juliano and Bronson did not "bundle" or act as a conduit for any contributions to the Gormley Committee. In addressing 15 of the 17 contributions at issue concerning Mirage, respondents aver that the Gormley Committee received these contributions "in connection with a single fund-raising event held at a restaurant in the Bellagio (then a Mirage subsidiary) in Las Vegas. Several Mirage executives, among others, attended this fundraising event." The response further adds that the Gormley Committee paid for this event in its entirety.

The response adds that "[t]he other two contributions, received from Herbert Gruder (\$1,000) and Dianne Poole (\$1,000) were not received in connection with the Las Vegas fund-raiser. In addition, the response states that neither Bronson nor Juliano "bundled" these contributions."

Additional publicly available information indicates the Bellagio fund-raiser was held on or about March 21, 2000 at a private room in the Le Cirque, a luxury restaurant within the Bellagio Hotel. The Gormley Committee's disclosure reports indicate that it paid the Bellagio \$1,718.51 on February 17, 2000, or roughly a month prior to the March 21, 2000 event. The

1 Gormley Committee reports also disclose individuals that made contributions on the date of the
2 fund-raiser that may have ties to Mirage. According to the Gormley Committee, on
3 March 21, 2000, David Weissman, an executive of Mirage Atlantic City, made two \$1,000
4 contributions, one for the 2000 Primary Election and one for the 2000 General Election. In
5 addition, the Gormley Committee reported receiving \$24,000 from 15 Nevada residents on
6 March 21, 2000. Thirteen of these 15 contributors are identified as either Mirage employees or
7 their spouses. A May 15, 2000 *New York Times* article reports the fund-raiser may have
8 generated as much as \$40,000 in receipts, however. The *New York Times* article also reports that
9 Mirage Chairman Steve Wynn may have been involved in organizing the fund-raiser.

10 **C. ANALYSIS**

11 **1. Corporate Facilitation**

12 **a. Applicable Law**

13 Under the Act, no person shall make contributions to any candidate and his authorized
14 committees regarding any election for Federal office, which, in the aggregate, exceed \$1,000.
15 2 U.S.C. § 441a(a)(1)(A). The Act also provides that a corporation may not make “a
16 contribution or an expenditure in connection with any election for federal office.” 2 U.S.C. §
17 441b(a). An officer or director of any corporation may not consent to any such contribution. Id
18 As used in Section 441b, the term “contribution” includes any direct or indirect payment,
19 distribution, loan, advance, deposit or gift of money, or any services, or anything of value to any
20 candidate, campaign committee, or political party or organization, in connection with a Federal
21 election. 2 U.S.C. § 441b(b)(2).

1 Additionally, it is unlawful for any candidate, political committee, or other person knowingly to
2 accept or receive any contribution prohibited by this section. 2 U.S.C. § 441b(a)

3 To effectuate this prohibition, corporations (including officers, directors or other
4 representatives acting as agents of corporations) are prohibited from facilitating the making of
5 contributions to candidates or political committees, other than to the separate segregated funds of
6 the corporations. 11 C.F.R. § 114.2(f). "Facilitation means using corporate . . . resources or
7 facilities to engage in fundraising activities in connection with any Federal election." *See also*
8 11 C.F.R. § 114.2(a)(2) (extending provisions of Section 114 of Title 11, Code of Federal
9 Regulations, to activities of national banks in connection with Federal, state, and local elections).

10 Examples of facilitating the making of contributions include, but are not limited to,
11 fundraising activities by corporations that involve:

- 12 • officials or employees of the corporation ordering or directing subordinates or support staff to
13 plan, organize or carry out the fundraising project as a part of their work responsibilities
14 using corporate resources, unless the corporation receives advance payment for the fair
15 market value of such services;
- 16 • failure to reimburse a corporation within a commercially reasonable time for the use by
17 persons, other than corporate shareholders or employees engaged in individual volunteer
18 activity, of corporate facilities described in 11 C.F.R. § 114.9(d) (i.e., facilities such as
19 telephones, typewriters or office furniture);
- 20 • using a corporate list of customers, clients, vendors, or others not in the restricted class to
21 solicit contributions in connection with a fund-raiser, unless the corporation receives advance
22 payment for the fair market value of the list;

- 1 ● using meeting rooms that are not customarily made available to clubs, civic or community
- 2 organizations or other groups; or
- 3 ● providing catering or other food services, unless the corporation receives advance payment
- 4 for the fair market value of the services. 11 C.F.R. § 114.2(f)(2)(i). Other examples of
- 5 prohibited facilitation include providing materials for the purpose of transmitting or
- 6 delivering contributions, such as stamps, envelopes addressed to a candidate or political
- 7 committee (other than the corporation's own separate segregated fund), or providing similar
- 8 items which would assist in transmitting contributions, 11 C.F.R. § 114.2(f)(2)(ii), and
- 9 collecting and forwarding contributions. *See. e g.* MUR 3672.

10 Facilitation activities may also involve “[u]sing coercion, such as the threat of a

11 detrimental job action, the threat of any other financial reprisal, or the threat of force, to urge any

12 individual to make a contribution or engage in fundraising activities on behalf of a candidate or

13 political committee.” 11 C.F.R. § 114.2(f)(2)(iv).

14 Exceptions to the general prohibition against corporate facilitation of contributions

15 include the “[s]oliciting of contributions to be sent directly to candidates if the solicitation is

16 directed to the [corporation's] restricted class. . . .” 11 C.F.R. § 114.2(f)(4)(ii). Pursuant to

17 11 C.F.R. § 114.1(a)(2)(i), such a restricted class includes a corporation's “stockholders and

18 executive and administrative personnel and their families,” with whom a corporation may

19 communicate on any subject. *See also* 11 C.F.R. § 114.3.

20 The cost of invitations, food and beverages is not a contribution where such items are

21 voluntarily provided by an individual volunteering personal services on the individual's premises

22 to a candidate for candidate – related activity to the extent that the aggregate value of such

1 invitations, food, and beverage provided by the individual on behalf of the candidate does not
2 exceed \$1,000 concerning any single election. 11 C.F.R. § 100.7(b)(6).

3 The sale of any food or beverage by a vendor (whether incorporated or not) for use in a
4 candidate's campaign, or for use by a political committee of a political party, at a charge less than
5 the normal or comparable commercial rate, is not a contribution, provided that the charge is at
6 least equal to the cost of such food or beverage to the vendor, to the extent that: the aggregate
7 value of such discount given by the vendor on behalf of any single candidate does not exceed
8 \$1,000 regarding any single election. 11 C.F.R. § 100.7(b)(7).

9 Section 104.9(a) of the Commission's regulations provides that political committees shall
10 report the full name and mailing address of each person to whom an expenditure in an aggregate
11 amount or value in excess of \$200 within the calendar year (or within the election cycle, in the
12 case of an authorized committee) is made from the reporting political committee's federal
13 account(s), together with the date, amount and purpose of such expenditure.

14 **b. Did Trump Hotels and Casino Resorts Facilitate the Making of**
15 **Contributions to the Gormley Committee?**
16

17 Based on the information currently available, there is insufficient evidence to justify a
18 reason to believe finding that the Trump Corporation used corporate resources to facilitate the
19 making of contributions for the Gormley Committee. The respondents at issue each deny that
20 anyone was coerced into making a contribution. The respondents also assert that no executive of
21 the Trump corporation or its subsidiaries collected or received a contribution to the Gormley
22 Committee from any other employee of the Trump corporation. Further, Donald Trump states in
23 his affidavit that only executives from the Trump corporation were invited to attend the
24 March 27, 2000 fund-raiser.

1 The responses of respondents Brown, Buro, and Mullin appear to mirror Trump's
2 assertions with few exceptions. While these respondents seem to differ on how often the Trump
3 corporate executives gathered for business meetings in New York City (Brown and Mullin stated
4 that the executives met there every Monday, Buro crossed out this language in his affidavit), they
5 each agree in line 7 of their respective affidavits that they traveled to New York City to attend a
6 business meeting of casino executives on Monday, March 27, 2000.

7 The vast majority of Trump employees reported in the Gormley Committee's disclosure
8 reports also appear to support the claim that only executives were in attendance. It seems likely
9 that the 31 Trump employees listed in the April Quarterly Report attended the reception, given
10 that respondents Mullin and Brown were listed among them, and their affidavits declare that they
11 made a contribution on March 27, 2000.

12 Only two of the 31 identifiable Trump employees may conceivably classify as non-
13 executive personnel. Antonio Campaniello, whose occupation is listed in the Gormley
14 Committee's April Quarterly Report as "Chef," apparently made a \$500 contribution on
15 March 30, 2000. The Gormley Committee's April Quarterly Report listed the occupation of the
16 second Trump employee in question, Vincent Mascio, Jr., as a manager, with no elaboration. It
17 is possible that neither the chef nor the manager (who may supervise non-salary employees) have
18 held supervisory responsibilities sufficient to qualify as "executive or administrative personnel"
19 as outlined in 11 C.F.R. §§ 114.1(b)(1) and (2). However, it is probable that both employees
20 hold supervisory responsibilities sufficient to classify as executive personnel. Nevertheless,
21 given the small number of possible non-executives, and a lack of information disputing the
22 respondents' claims that executives traveled to New York City primarily for a business meeting,

1 voluntarily attended the Gormley fund-raiser, and were not compelled to make contributions to
2 the Gormley Committee, this Office believes that there is insufficient information to warrant
3 further investigation.

4 However, as noted below, this Office is making recommendations regarding Donald
5 Trump's activities in his individual capacity in connection with the March 27, 2000 fund-raiser.
6 Accordingly, this Office recommends that the Commission take no action at this time regarding
7 the Trump Corporation, and its corporate officers, Donald J. Trump, Mark Brown, Fred Buro,
8 and Lawrence Mullin concerning a 2 U.S.C. § 441b(a) violation in case we develop information
9 about the corporation's role.

10 **c. Did Donald Trump violate 2 U.S.C. § 441a(a)(1)(A)?**

11 Accepting Trump's position that he sponsored the event with his own personal funds,
12 there is reason to believe that Trump violated 2 U.S.C. § 441a(a)(1)(A). Mr. Trump asserts in his
13 response to the complaint that he paid for all of the food, beverages, and invitations associated
14 with the event with his personal funds, not through those of Trump Hotels and Casino Resorts,
15 Inc. As mentioned above, 11 C.F.R. § 100.7(b)(6) provides that the cost of invitations, food and
16 beverages is not a contribution where such items are voluntarily provided by an individual
17 volunteering personal services on the individual's residential premises (as specified at 11 CFR §
18 100.7(b)(4)) to a candidate for candidate related activity. The regulations also provide that the
19 aggregate value of such invitations, food and beverages provided by the individual on behalf of
20 the candidate must not exceed \$1,000 with respect to any single election. The Gormley
21 Committee's disclosure reports do not report that Trump made any contributions to the Gormley
22 campaign. Thus, Mr. Trump avoids making an excessive in-kind contribution if the total cost of

1 the invitations, food, and beverages for the fund-raiser at his residence does not exceed \$2,000:
2 \$1,000 for the cost of the invitations, food, and beverages; and \$1,000 as an in-kind contribution
3 for use in the 2000 Primary Election.

4 The information presented appears to suggest that it is likely that Mr. Trump's
5 sponsorship for the function exceeded the \$2,000 threshold. It seems unlikely that Trump would
6 expend only \$2,000 for an event that attracted at least 100 people; at that low estimate, Trump
7 paid an average cost of \$20 per person for food, beverages and invitations. While more
8 information is needed to determine the full costs incurred by Trump to provide food, beverages,
9 and send invitations, it appears that Mr. Trump's actions regarding the March 27, 2000 reception
10 violates 2 U.S.C. § 441a(a)(1)(A).

11 Accordingly, this Office recommends that the Commission find reason to believe that
12 Donald J. Trump violated 2 U.S.C. § 441a(a)(1)(A). This Office also recommends that the
13 Commission find reason to believe that the Gormley Committee and Alan C. Staller, as treasurer,
14 violated 2 U.S.C. 441a(f) by accepting an excessive in-kind contribution from Donald Trump.

15 **d. Did Harrah's Entertainment, Inc. Facilitate the Making of Contributions to the**
16 **Gormley Committee?**
17

18 The information currently available, based on a review of news items, conduit reports, the
19 complaint and responses, raises concerns that Harrah's, through key corporate executives, may
20 have facilitated the making of contributions to the Gormley Committee in two respects. First, the
21 information available suggests that respondents Wolfe and David Jonas ("Jonas"), the principal
22 executives of their respective subsidiaries, on behalf of Harrah's, established a uniform effort to
23 obtain contribution checks from employees. Within this scenario, it appears that the corporation
24 established: (1) the time period for collecting the contributions (the last two weeks in March

1 2000), (2) where the contributors would submit their checks (each manager's office suite); and
2 (3) when the Gormley representative would pick up contribution checks (possibly
3 March 29, 2000). The striking similarities between Jonas' mode of obtaining contributions and
4 that of Wolfe's appear to be more than mere coincidence. Second, the actual collecting and
5 forwarding of the contributions for the Gormley Committee also represented corporate
6 facilitation.

7 Respondents Wolfe and Jonas' actions appear to demonstrate a uniform corporate effort
8 on behalf of the Harrah's corporation to facilitate the making of contributions for the Gormley
9 Committee based on three factors. First, the conduit reports filed appear to indicate that both
10 respondents limited the scope of obtaining contributions almost entirely to employees within
11 Harrah's, either from Harrah's Eastern Operations Division, or subsidiaries. A review of
12 Wolfe's conduit report clearly shows that he only received contributions (seventeen in all) from
13 employees of Atlantic City Showboat, Inc., a subsidiary of Harrah's where Wolfe was employed
14 as general manager. Regarding Jonas, the general manager of Marina Associates, all but one of
15 the 53 contributions he collected for the Gormley campaign were attributable to Harrah's
16 employees or subsidiaries.⁵ Given that these respondents collected 69 of 70 contributions from
17 Harrah's employees or subsidiaries, it seems likely that their activities may have been corporate
18 in nature.

⁵ Jonas received 47 contributions from employees of Marina Associates, five (5) from employees of Harrah's Eastern Operations Division, and one (1) from an employee of Tropicana Casino and Entertainment Resort. Although the Jonas conduit report discloses Louis Paludi's occupation as a self-employed consultant, this Office has included him among the Harrah's Eastern Operations Division contributors given that the Gormley Committee's 2000 April Quarterly Report identifies him as a Harrah's executive.

1 It also appears that these respondents' probable solicitation of contributions from the 69
2 employees of Harrah's Entertainment Inc. or its subsidiaries may not fall within the restricted
3 class. The following managers listed in Jonas' conduit report may supervise non-salary
4 employees: William Ambrosio (Games Shift Manager); Michael Booker (Slot Shift Manager);
5 Christine Boxer (Slot Shift); Anthony Ciallella (Games Shift); Glen Cunningham (Games Shift);
6 Kimberly Grahslar (Volume Restaurant); Mark Kashuda (Slot Shift); Paul Merrick (Stage);
7 John Ranere (Credit); Charlie Sanderson (Slot Performance); and Mark Starrett (Player
8 Services).

9 Additionally, Ross O'Hanley, who is employed as the President's Associate, may or may
10 not have the requisite supervisory responsibilities to be part of the restricted class, and George
11 Ashman, a manager listed in Wolfe's conduit report, may supervise non-salary employees, which
12 does not satisfy the restricted class criteria outlined in 11 C.F.R. §§ 114.1(b)(1) and (2); the
13 conduit report strictly acknowledges him as a manager, but does not elaborate as to type.⁶ Thus,
14 more information is needed to determine whether or not these managers were part of the
15 restricted class entitled to receive Wolfe and Jonas' solicitation for contributions to the Gormley
16 Committee.

17 Second, the manner in which respondents Wolfe and Jonas collected these contributions
18 also seem to indicate an overall corporate facilitation effort. Their actions appear to be part of a
19 plan where they directed employees to deliver contribution checks to their respective office suites
20 within the last two weeks of March 2000. In fact, Wolfe states in his response that "many of the

⁶ The Gormley Committee's April Quarterly Report does not specify as to what type of manager George Ashman serves for the company

1 listed contributors delivered their checks to his office suite during the last two weeks of March
2 2000.” He adds that only a few of the contributors delivered their checks directly to the Gormley
3 Committee. Jonas’ statement describes the same pattern, with one exception. Instead of
4 receiving most of the contributions listed in his conduit report, Jonas states that all 53
5 contributions were delivered to his office suite, stating “[a]s a matter of convenience, during the
6 last two weeks of March 2000, the contributors delivered their contribution checks to Jonas’
7 office suite.”

8 Finally, both responses also appear to demonstrate a plan within Harrah’s corporate
9 structure of forwarding the contributions to the Gormley Committee. In both of their statements,
10 respondents note that a representative of the Gormley Committee picked up the checks at the end
11 of March 2000; Jonas states that the representative picked up the checks on March 29, 2000,
12 while Wolfe avers that the pick-up for his collected contributions occurred on or about
13 March 30, 2000. The fact that both respondents forwarded their collected contribution checks to
14 the Gormley Committee during the same time period may suggest an organized effort on
15 Harrah’s part to facilitate the making of contributions for the benefit of the Gormley campaign by
16 setting a time period for the pick-up of contribution checks.

17 Considering all of the above stated reasons, it appears that Jonas and Wolfe, acting on
18 behalf of Harrah’s Entertainment, Inc., may have used corporate resources to confer a benefit on
19 the Gormley Committee. Accordingly, this Office recommends that the Commission find reason

1 to believe that Harrah's Entertainment, Inc , Atlantic City Showboat, Inc., Marina Associates,⁷
2 and Herbert Wolfe and David Jonas, as officers, violated 2 U.S.C. § 441b(a). Given that the
3 information presented appears to suggest that Howard Jonas was not involved in this matter, this
4 Office recommends that the Commission find no reason to believe that Howard Jonas violated
5 any provision of the Act. Considering the Gormley Committee's involvement in receiving
6 contributions from Harrah's corporate executives, this Office also recommends that the
7 Commission find reason to believe that the Gormley for Senate Primary Election Fund and
8 Alan C. Staller, as treasurer, violated 2 U.S.C. § 441b.

9 **e. Did Mirage Casino Resorts, Inc. Facilitate the Making of Contributions to the**
10 **Gormley Committee?**
11

12 Based on a review of news items, the complaint and responses, this Office recommends
13 that the Commission find reason to believe that Mirage Casino Resorts, Inc. both facilitated the
14 making of contributions and made prohibited in-kind contributions for the Gormley Committee
15 based on the following considerations

- 16 • Mirage may have conferred a benefit on the Gormley Committee by using its corporate
17 resources to collect and forward contribution checks to the Gormley Committee.
- 18 • Press Reports also suggest that more people may have attended the Bellagio fund-raiser than
19 implied in the Mirage respondents' July 6, 2000 joint response. The number of persons in
20 attendance is important as it may show that the Gormley Committee paid for the event at a
21

⁷ This Office has determined, through a Dun and Bradstreet search, that Marina Associates' two managing partners are incorporated 1) Harrah's Atlantic City Inc , and 2) Harrah's New Jersey Inc Under 11 C F R. § 110 1(e), a contribution by a partnership shall be attributed to both the partnership and to each partner in proportion to the partner's share of the profits The regulation also provides that no portion of a partnership contribution may be made from the profits of a corporation that is a partner Therefore, it appears that corporate facilitation on Marina Associates' part could constitute an in-direct corporate contribution

1 rate lower than the normal course of business.

- 2 • The information presented, though limited, appears to indicate that the Gormley Committee
3 obtained a corporate resource in the form of a list of vendors for purposes of the Bellagio
4 fund-raiser without compensating Mirage.

5 By explaining how the Gormley Committee received contributions from Mirage
6 employees, the collective response of the Mirage respondents raises questions about possible
7 corporate facilitation. In its response, the Gormley Committee did not address the Bellagio fund-
8 raiser. The response of the Mirage respondents appears to suggest that the Bellagio fund-raiser
9 did not take place in Atlantic City, New Jersey. Instead, it seems that the Bellagio fund-raiser
10 took place at a Mirage owned restaurant in the Bellagio Casino Resort in Las Vegas, Nevada,
11 thousands of miles away. In addition, according to the July 6, 2000 joint response of Juliano and
12 Bronson, who were known to be supporters of the Gormley campaign, the "single fund-raising
13 event" included several Mirage executives and other individuals. In their responses, Juliano and
14 Bronson also admit that nine of the eleven Mirage employees listed in the complaint attended the
15 event.

16 **1. Use of Corporate Resources to Collect and Forward Contributions**

17 The Gormley Committee's reports raise concerns about possible corporate facilitation
18 because they do not show any apparent travel expenses incurred by Gormley in attending the
19 event. A May 15, 2000 New York Times article⁸ makes the charge that "State Senator
20 William L. Gormley . . . slipped away from the campaign trail for an unpublicized visit to

⁸ *New York Times*, "Casinos put Money in Race in New Jersey" May 15, 2000.

1 Las Vegas.” Furthermore, the article reports “[t]here to greet Mr. Gormley at the Le Cirque
2 restaurant, Steve Wynn’s sumptuous new fun house, was the gambling magnate himself.” The
3 article also reports that Wynn was involved in the planning of the event, noting “Mr Wynn had
4 gathered casino executives for a fund-raiser that collected about \$40,000 in donations for
5 Gormley, who in recent years has championed an effort by New Jersey to spend more than \$200
6 million to subsidize the opening of a Wynn casino in Atlantic City.” Neither the Mirage
7 respondents nor the Gormley Committee have provided any information about whether Gormley
8 attended.

9 It would seem likely that Gormley would incur expenses through travel from Atlantic
10 City to Las Vegas, Nevada. At a minimum, he would incur airline fare and transportation
11 charges from the airport to the Bellagio Hotel.

12 Nevertheless, the Gormley Committee’s April Quarterly and June Quarterly reports show
13 no payments or debts to airlines, no reimbursements or debt of any sort to Gormley, and no
14 payments or debts to credit card companies. Indeed, the only reported travel disbursement of
15 more than \$200 is a \$349 reimbursement for travel and lodging expenses to a committee staff
16 person on April 19, 2000.

17 The scarcity of reimbursement information in the Gormley Committee’s disclosure
18 reports regarding travel expenses incurred due to the Bellagio fund-raiser can be explained in two
19 ways, and both of these scenarios warrant further investigation. First, the *New York Times* article
20 may have been in error and neither Gormley nor aides may have been present at the event.
21 However, given the number of Mirage executives contributing and the reports of Wynn’s
22 personal involvement, such an outcome would likely indicate that at a minimum Mirage

1 executives collected and forwarded checks for the benefit of the Gormley Committee. As such,
2 Mirage would facilitate the making of contributions for a Federal election. *See, e.g.*, MUR 3672.

3 Another possible explanation is that Gormley and/or aides did in fact attend the fund-
4 raiser, but did not report the travel expenses incurred for the Las Vegas trip. Such mis-reporting
5 violates 2 U.S.C. § 434(b), and warrants further investigation to obtain a clearer picture of what
6 actually happened.

7 **2. Mirage may have charged a Fee lower than the Fair Market Value**

8 Given the luxury status surrounding the Le Cirque restaurant at the Bellagio, it appears
9 possible that the cost of holding a fund-raising function at the restaurant may have exceeded the
10 amount apparently paid by the Gormley committee, thereby potentially resulting in an in-kind
11 contribution from Mirage to Gormley even after accounting for permissible food and beverage
12 discounts. The Gormley Committee's Amended April Quarterly Report discloses that on
13 February 17, 2000 it paid \$1,718.51 in event costs to the Bellagio. Press reports have touted the
14 Bellagio, which opened in October 1998 at a cost of \$1.6 billion,⁹ as one of the most luxurious
15 casino resorts in the world. The May 15, 2001 New York Times article states that the fund-raiser
16 took place at the Le Cirque restaurant in the Bellagio.

17 According to the Le Cirque Bellagio's website, there are a number of pricing options for
18 private parties. Attachment 11. First, there is a charge for the use of the private room, which

⁹ In an October 8, 1998 *Las Vegas Sun* article, Warren Marr, gaming consultant for PriceWaterhouseCooper, declared the Bellagio the most expensive hotel ever built

1 varies from \$500 to \$1,000.¹⁰ Second, there is an additional charge for the food at the party,
2 which depends on the type of meal served. If the event is a dinner party, for example, the charge
3 is between \$80 to \$170 per person with an additional 20% service charge and 7.25% for tax.

4 As noted above, 11 C.F.R. § 100.7(b)(7) provides that a vendor is privileged to sell food
5 and beverages at a discount so long as: (1) the difference between the discount price and the
6 vendor's usual and normal charge does not exceed \$1,000 per candidate, per election, and (2) the
7 discount price is no lower than the vendor's cost. Depending on the number of persons
8 attending, the nature of the food and beverage provided, the time of day of the event, and the
9 particular private room used, it appears that the difference between the discount price and the
10 usual and normal charge would have exceeded \$1,000. If, for example, 25 persons were present
11 and the type of meal service was dinner (costing between \$80 and \$170) at the Circo private
12 room, which charges \$700 for the use of the room, the result is a prohibited contribution
13 irrespective of 11 C.F.R. § 100.7(b)(7); the attendance of 25 persons at the Bellagio fund-raiser is
14 a reasonable speculation based on the *New York Times* account indicating that more contributions
15 were generated by the fund-raiser than originally discerned by this Office, and/or
16 by the possible attendance of senior Gormley staff.

17 Section 100.7(b)(7) applies only to the sale of food and beverages. As such, the Bellagio
18 could not offer a discount on the charge of the room. As noted in the above example, the charge
19 for the use of the Circo private room is \$700. For purposes of this scenario, given that the room

¹⁰ According to the Le Cirque website (www.lecirque.com), three private rooms are available, ranging from \$500 to \$1,000. First, at a charge of \$500, the Saltimbanco room seats 25 to 50 patrons for either lunch or dinner, or it can hold 60 persons for a cocktail reception. Second, the Circo Private Room seats 25 to 30 patrons for either lunch or dinner at a charge of \$700. Alternatively, the Circo Private Room can hold 40 persons for a cocktail reception. Finally, at a charge of \$1,000, the Le Cirque room can hold 40 - 80 persons for lunch.

1 charge is not applicable to 11 C.F.R. § 100.7(b)(7), the \$700 Circo private room charge reduces
2 the total amount that the Gormley Committee paid for the meal portion of the event to \$1,018.51;
3 the total amount that the Gormley Committee paid for the event (\$1,718.51) less \$700. Thus, for
4 purposes of 11 C.F.R. § 100.7(b)(7), Mirage could charge the Gormley Committee \$1,018.51 for
5 the food and beverage portion of the event only if the difference between the discount price
6 (\$1,018.51) and the usual and normal charge does not exceed \$1,000.

7 If dinner was the meal service provided, applying the lowest charge applicable would still
8 amount to a prohibited in-kind contribution. If the meal per person charge was \$80 (out of a
9 possible \$170), and the appropriate service charges and tax (20% and 7.25% respectively) are
10 added, the usual and normal charge would be \$2,550. Such an amount represents a \$1,531
11 difference between the normal business charge for food (\$2,550) and the charge at least equal to
12 cost (\$1,018.51). Hence, Mirage would be making a prohibited contribution of at least \$531, in
13 violation of 2 U.S.C. § 441b(a). While it is possible that fewer people attended, which might
14 result in no contribution, it is also possible that more attended – or that the meal served was not
15 the least expensive available. Either factor could substantially increase the amount of the
16 potential corporate contribution. Further investigation is necessary to obtain the complete facts
17 in this matter.

18 3. The use of a Mirage Corporate List without Compensation

19 Finally, the information currently available appears to suggest that regardless of who
20 organized the Bellagio fund-raiser, it is likely that they would have needed to utilize the
21 corporate resources of Mirage Casino Resorts to devise a list of individuals to invite. The
22 Gormley Committee's April Quarterly Report confirms the nine individuals mentioned in the

1 July 6, 2000 response as Mirage executives. Of these executives, David Weissman, listed in the
2 report as an executive of Mirage Atlantic City, appears to be the lone non-Nevada resident in
3 attendance; Weissman made two \$1,000 contributions to the Gormley Committee.

4 It seems likely that the Nevada residents listed in the Gormley Committee's April
5 Quarterly Report as having made contributions to the Gormley Committee on March 21, 2000
6 also attended the fund-raiser at the Mirage Bellagio. The Gormley Committee reported receiving
7 \$24,000 from 15 Nevada residents on March 21, 2000. The Gormley Committee reported
8 thirteen of these 15 as Mirage employees and their spouses.¹¹

9 The two other Nevada residents that made contributions on March 21, 2000 appear to
10 either qualify as vendors, clients, or customers with ties to Mirage Casino Resorts. While the
11 April Quarterly Report classifies Mark Tratos as a "self-employed" attorney, press accounts
12 report that Tratos has represented Mirage in a lawsuit involving a trademark dispute.¹²
13 Regarding the second Nevada resident, Charles Mathewson, while the Gormley April Quarterly
14 vaguely describes his occupation as a Vice President for the employer "Public Affairs Affairs,"
15 this Office has discovered that Mr. Mathewson is the Chairman of International Game
16 Technology ("IGT"), a gaming manufacturer known for making spinning-reel slot machines,
17 video gaming machines, and MegaJackpot progressive slot systems for legal gaming jurisdictions
18 worldwide. Both individuals made two \$1,000 contributions, one for the 2000 Primary Election,
19 and one for the 2000 General Election.

¹¹ In addition to the eight Mirage employees and three spouses, this number also includes two executives from Mirage subsidiaries William McBeath, president of Treasure Island, and Robert Sheldon, president of Golden Nugget Las Vegas

¹² *Las Vegas Sun*, news column dated May 12, 2000

Hence, a review of the statements of the Mirage respondents, coupled with the Gormley Committee's disclosure reports, appear to suggest that (1) there were at least 16 contributors in attendance at the March 21, 2000 Bellagio fund-raiser; (2) the event raised at least \$26,000 for the Gormley campaign; and (3) the event consisted entirely of Mirage executives, their spouses, and vendors, customers, or clients associated with the corporation.

As noted above, however, it appears that the actual number of contributions and attendees may have been higher. The Mirage respondents never stated in their response that the total number of contributions and attendees were limited to the figures alleged in the complaint. The response merely confirms that the persons noted in the complaint did in fact attend the fund-raiser. The aforementioned New York Times article, by contrast, estimates the amount of contributions received at a much higher amount, i.e. \$40,000. This could mean that more than 16 people attended the Bellagio fund-raiser. The Gormley April Quarterly reports discloses at least 24 other individuals that made contributions on or about March 21, 2000. While none of these individuals are residents of Nevada, a number of these contributors are employees from business fields (such as construction) that may have ties to Mirage regarding its future business endeavor in Atlantic City. More information is needed to ascertain whether additional vendors, clients, or customers of Mirage Casino Resorts attended the Bellagio fund-raiser.

Given this information, it appears essential for the individual(s) responsible for organizing the event to contact business associates through the use of a Mirage corporate list of vendors, clients, or customers tied to the corporation. As noted above, under 11 C.F.R. § 114.2(f)(C), using a corporate list to solicit contributions in connection with a fund-raiser is one example of corporate facilitation, unless the corporation receives advance payment

1 for the fair market value of the list. The Gormley Committee did not respond to this issue, so
2 this Office has no insight as to who obtained access to this corporate resource. Furthermore,
3 because of their silence, this Office is unable to ascertain whether anyone from the committee
4 purchased the list, and for what price. The July 6, 2000 response by the Mirage respondents is
5 also silent in this regard.

6 The information currently available does not implicate respondents Juliano and Bronson
7 in a scheme to facilitate the making of contributions to the Gormley Committee; however, if
8 additional information in the discovery phase reveals their involvement, this Office would
9 recommend at that time that the Commission take action regarding them. Therefore, this Office
10 recommends that the Commission take no action at this time regarding Mirage executives
11 Robert "Skip" Bronson and Mark Juliano.

12 Based on the reasons discussed above, there is reason to believe that Mirage violated
13 2 U.S.C. § 441b(a). Accordingly, this Office recommends that the Commission find reason to
14 believe that Mirage Casino Resorts Inc. violated 2 U.S.C. § 441b(a). Given that this Office
15 internally generates Steve Wynn as a respondent in this matter, this Office recommends that the
16 Commission find reason to believe that Steve Wynn, as an officer, violated 2 U.S.C. § 441b(a).
17 This Office also recommends that the Commission find reason to believe that the Gormley
18 Committee and Alan C. Staller, as treasurer, violated 2 U.S.C. §§ 434(b) and 441b, and further
19 investigate this matter.

20

21

22

1 **III. PROPOSED DISCOVERY**

2
3
4 **IV. RECOMMENDATIONS**

- 5 1. Find reason to believe that the Gormley for Senate Primary Election Fund and
6 Alan C. Staller, as treasurer, violated 2 U.S.C. §§ 434(b), 441a(f), and 441b.
7
8 2. Take no action at this time regarding Trump Hotel and Casino Resorts, Inc., and
9 Messrs. Donald J. Trump, Fred Buro, Mark Brown, and Lawrence Mullin, as officers
10
11 3. Find reason to believe that Donald J. Trump violated 2 U.S.C. § 441a(1)(A).
12
13 4. Find reason to believe that Harrah's Entertainment, Inc., violated 2 U.S.C. § 441b(a)
14
15 5. Find reason to believe that Atlantic City Showboat, Inc. and Herbert Wolfe, as an
16 officer, violated 2 U.S.C. § 441b(a).
17
18 6. Find reason to believe that Marina Associates and David Jonas, as an
19 officer, violated 2 U.S.C. § 441b(a).
20
21 7. Find no reason to believe that Howard Jonas violated any provision of the Act and
22 close the file regarding this respondent
23
24 8. Find reason to believe that Mirage Casino Resorts, Inc., and Steve Wynn, as an
25 officer, violated 2 U.S.C. § 441b(a).
26
27 9. Take no action at this time regarding Mark Juliano
28
29 10. Take no action at this time regarding Richard "Skip" Bronson.
30
31 11. Approve the attached Factual and Legal Analyses
32
33

12. Approve the appropriate letters.

Lawrence H. Norton
General Counsel

9/27/01
Date

BY:

Rhonda J. Vosdigh
Rhonda J. Vosdigh
Acting Associate General Counsel

Attachments:

1. Allan Staller response on behalf of the Gormley for Senate campaign dated June 19, 2000.
2. Trump Hotel and Casino Resorts, Inc., Donald J Trump, Mark Brown, Fred Buro, and Lawrence Mullin response dated June 30, 2000.
3. Affidavit of Donald J. Trump dated June 26, 2000.
4. Affidavit of Mark Brown dated May 31, 2000.
5. Affidavit of Fred Buro dated May 23, 2000.
6. Affidavit of Lawrence Mullin dated June 2, 2000.
7. Harrah's Entertainment, Inc. and Herbert Wolfe response dated June 20, 2000.
8. David Jonas Conduit Report.
9. Herbert Wolfe Conduit Report.
10. Mirage Casino Resorts, Inc., Mark Juliano, and Richard Bronson response dated July 6, 2000.
11. Prices and details for Private Function Rooms at the Le Cirque Bellagio.
12. Factual and Legal Analysis for Gormley for Senate Primary Election Fund.
13. Factual and Legal Analysis for Donald Trump.
14. Factual and Legal Analysis for Harrah's Entertainment, Inc.
15. Factual and Legal Analysis for Harrah's Atlantic City Showboat, Inc.
16. Factual and Legal Analysis for Herbert Wolfe.
17. Factual and Legal Analysis for Marina Associates.
18. Factual and Legal Analysis for David Jonas.
19. Factual and Legal Analysis for Mirage Casino Resorts, Inc.
20. Factual and Legal Analysis for Steve Wynn.

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Private Function Rooms

A fee will be charged for the use of our private rooms:

Le Cirque (Lunch) 40 - 80 pp. \$ 1,000

Circo Private Room (Lunch or Dinner) \$ 700

This room is located in Osteria del Circo

Dimensions:

25 - 30 persons seated at round and rectangular tables

Cocktail reception: 40 persons

(Time and availability limited, if interested please inquire)

Saltimbanco (Lunch or Dinner) \$500

This room is located in Osteria del Circo

Dimensions: 31'x19' (589 square feet)

25 - 50 persons seated at round tables

Cocktail reception: Up to 60 person.

Prices and Details for a Private Party

Lunch: \$ 55 - 80 per person

Dinner: \$ 80 - 170 per person

Service (20%) and tax (7.25%) will be added.

To plan a menu for your event, please contact

Jennifer J. Hollifield

at

702-693-8135

jhollifield@bellagioresort.com

Attachment 11
Page 1 of 2

Prices for a Cocktail Party

Selection of hot and cold Hors d'oeuvres: \$ 40 - 60 per person

Special Arrangements

To beautify your event, floral arrangements can be provided, or if you require special services such as audio/visual equipment please contact

Jennifer J. Hollifield

at

702-693-8135

jhollifield@bellagioresort.com

These items will be charged seperately.

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TV Food Network with Bill Boggs

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Attachment 11
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